

BEFORE THE
Federal Communications Commission
 WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In re Applications of)
)
 MARTIN W. HOFFMAN,)
 Trustee-in-Bankruptcy for Astroline)
 Communications Company Limited)
 Partnership)
)
 For Renewal of License of Station)
 WHCT-TV, Hartford, Connecticut)
)
 SHURBERG BROADCASTING OF HARTFORD)
)
 For Construction Permit for a New)
 Television Station to Operate on)
 Channel 18, Hartford, Connecticut)

MM Docket No. 90-178
 FCC File No. BRCT-881201LG

FCC File No. BPCT-831202KF

TO: The Honorable John M. Frysiak
 Administrative Law Judge

**JOINT RESPONSE TO DISCOVERY REQUESTS OF
 SHURBERG BROADCASTING OF HARTFORD**

Martin W. Hoffman, Trustee-in-Bankruptcy for Astroline Communications Company Limited Partnership (the "Trustee"), Two-If-By-Sea Broadcasting, Inc. ("TIBS"), and Richard Ramirez ("Ramirez") (hereinafter the "Respondents" when referred to jointly) hereby submit their Joint Response to the "Requests for Admissions of Fact," the "Contingent First Set of Interrogatories," and the "Contingent Request for Production of Documents" (the "Motions") which were propounded to the Trustee, TIBS and Ramirez on July 21, 1998, by Shurberg

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Broadcasting of Hartford ("SBH").^{1/} The pleadings served on each of the Respondents are identical in nature, and the three Motions are interrelated. Thus, the filing of a Joint Response to all three Motions will conserve the resources of the parties and the Commission.

- (a) The Respondents do not have in their possession and are not presently aware of any documents which reflect that Astroline Communications Company Limited Partnership ("ACCLP") (either directly or through an agent or representative of ACCLP) ever submitted to the Federal Communications Commission ("the Commission") a copy of the document entitled "Astroline Communications Company Limited Partnership Amended and Restated Limited Partnership Agreement and Certificate" ("December 31, 1985 Agreement") which, by its terms, was effective December 31, 1985. However, the FCC files appear to be incomplete.
- (b) The Respondents do not have in their possession and are not presently aware of any documents which reflect that ACCLP (either directly or through an agent or representative of ACCLP) ever advised the Commission of the existence of the December 31, 1985 Agreement except that ACCLP advised the Commission of its ownership structure in a filing received by the Commission on August 3, 1987.^{2/} However, the FCC files appear to be incomplete.
- (c) The Commission was advised on August 3, 1987 of certain respects in which the December 31, 1985 Agreement revised the original ACCLP partnership agreement entered into on May 29, 1984.
- (d) On August 3, 1987, ACCLP filed with the Commission ownership information in lieu of its annual ownership report.

^{1/} In a telephone conference call on August 5, 1998, the Presiding Administrative Law Judge granted Respondents an extension of time until August 14, 1998 to respond to SBH's Motions.

^{2/} A copy of the August 3, 1987 filing is attached. The Commission's files appear to be missing this filing and other filings from the 1980s. Respondents are uncertain whether there were any attachments to the August 3, 1987 filing.

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- (e) The Trustee admits that his counsel filed a brief with the United States Court of Appeals for the Second Circuit dated November 8, 1996, that included at page 11 the language quoted in the Request for Admission; except as expressly so admitted, the Trustee refers to his counsel's brief for its full and complete text.

Respectfully submitted,

MARTIN W. HOFFMAN,
Trustee-in-Bankruptcy
For Astroline Communications
Company Limited Partnership

Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-3350

By: Peter D. O'Connell
Peter D. O'Connell
His Attorney

TWO-IF-BY-SEA
BROADCASTING, INC.

Fleischman and Walsh, L.L.P.
1400 16th Street, N.W.
Washington, D.C. 20036
(202) 939-7900

By: _____
Howard A. Topel
Its Attorney

RICHARD RAMIREZ

Fisher Wayland Cooper Leader
and Zaragoza L.L.P.
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20006
(202) 659-3494

By: _____
Kathryn R. Schmeltzer
His Attorney

Dated: August 14, 1998

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-3-

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By: _____
Peter D. O'Connell
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TWO-IF-BY-SEA
BROADCASTING, INC.

Fleischman and Walsh, L.L.P.
1400 16th Street, N.W.
Washington, D.C. 20036
(202) 939-7900

By: Howard A. Topel
Howard A. Topel
Its Attorney

RICHARD RAMIREZ

Fisher Wayland Cooper Leader
and Zaragoza L.L.P.
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20006
(202) 659-3494

By: _____
Kathryn R. Schmeltzer
His Attorney

Dated: August 14, 1998

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Fleischman and Walsh, L.L.P.
1400 16th Street, N.W.
Washington, D.C. 20036
(202) 939-7900

By: _____
Howard A. Topel
Its Attorney

RICHARD RAMIREZ

Fisher Wayland Cooper Leader
and Zaragoza L.L.P.
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20006
(202) 659-3494

By: Kathryn R. Schmeltzer
Kathryn R. Schmeltzer
His Attorney

Dated: August 14, 1998

BAKER & HOSTETLER

IN CLEVELAND, OHIO
3200 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 621-0200
TWX 810 421 8375

IN COLUMBUS, OHIO
65 EAST STATE STREET
COLUMBUS, OHIO 43215
(614) 228-1541

IN MARYLAND
5000 SUNNYSIDE AVE. SUITE 301
BELTSVILLE, MARYLAND 20705
(301) 937-4111

ATTORNEYS AT LAW
WASHINGTON SQUARE, SUITE 1100
1050 CONNECTICUT AVE., N.W.

WASHINGTON, D.C. 20004

(202) 861-1500

TELECOPIER: (202) 466-2388

TELEX 650-235-7276

IN DENVER, COLORADO
SUITE 1100, 303 EAST 17TH AVENUE
DENVER, COLORADO 80203
(303) 861-0600

IN ORLANDO, FLORIDA
13TH FLOOR BARNETT PLAZA
ORLANDO, FLORIDA 32801
(305) 841-1111

IN VIRGINIA
437 N. LEE STREET
ALEXANDRIA, VIRGINIA 22314
(703) 549-1294

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Office of the Secretary

WRITER'S DIRECT DIAL NO.:

(202) 861-1658

August 3, 1987

Mr. William Tricarico
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

Dear Mr. Tricarico:

Astroline Communications Company Ltd. Partnership ("Astroline"), licensee of WHCT-TV, Hartford, Connecticut, through counsel, hereby reports the following ownership information in lieu of filing its official Annual Ownership Report. Astroline is currently in the process of resolving a number of matters that have arisen as a result of the recent Court of Appeals Order in Shurberg v. FCC, No. 84-1600 (D.C. Cir., June 25, 1987) (remanding case to FCC); the death of Joel A. Gibbs, one of the Limited Partners of Astroline Company; and an internal reorganization. A complete Ownership Report will be filed as soon as possible.

To ensure full disclosure of Astroline's ownership in the interim period, the ownership structure of Astroline and its general and limited partners is reported as follows:

Astroline Communications Company Ltd. Partnership

<u>Name</u>	<u>Partnership/ Interest</u>	<u>Equity Interest</u>	<u>Voting Interest</u>	<u>Other Broadcast Interest</u>
Richard P. Ramirez	General Partner	21%	78%	None
WHCT Management, Inc.	General Partner	6%	22%	None
Astroline Company	Limited Partner	58%	0%	None
Thelma Gibbs	Limited Partner	6%	0%	None
Martha & Robert Rose	Limited Partner	6%	0%	None
Terry Planell	Limited Partner	3%	0%	None

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WHCT Management, Inc.

<u>Name</u>	<u>Officer or Directorship</u>	<u>No. of Shares</u>	<u>No. of Votes</u>	<u>Other Broadcast Interests</u>
Herbert A. Sostek	Chairman of Bd./ C.E.O./Director	200	20%	None
Fred J. Boling, Jr.	Pres./Treas./ Chief Operating Officer/Director	200	20%	None
Richard H. Gibbs	V.P./Director	200	20%	None
Randall L. Gibbs	None	200	20%	None
Estate of Joel A. Gibbs	None	200	20%	None
William C. Lance	Clerk	None	None	None

Astroline Company

<u>Name</u>	<u>Partnership/ Interest</u>	<u>Equity Interest</u>	<u>Voting Interest</u>	<u>Other Broadcast Interests</u>
Herbert A. Sostek	Gen. Partner/ Lim. Partner	1% g.p./ 19% l.p.	25%	None None
Fred J. Boling, Jr.	Gen. Partner/ Lim. Partner	1% g.p./ 19% l.p.	25%	None None
Richard H. Gibbs	Gen. Partner/ Lim. Partner	1% g.p./ 19% l.p.	25%	None None
Randall L. Gibbs	Gen. Partner/ Lim. Partner	1% g.p./ 19% l.p.	25%	None None
Estate of Joel A. Gibbs	Lim. Partner	20% l.p.	0%	None

If there should be any questions concerning this matter,
please do not hesitate to contact me.

Sincerely,


Thomas A. Hart, Jr.

TAH:bjl

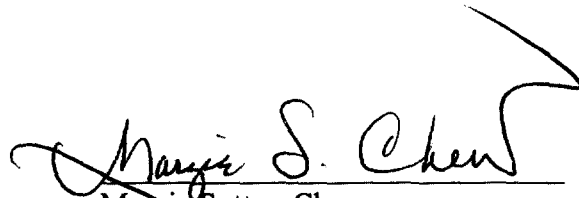
CERTIFICATE OF SERVICE

I, Margie Sutton Chew, a secretary in the law firm of Fisher Wayland Cooper Leader & Zaragoza L.L.P., do hereby certify that true copies of the foregoing **"JOINT RESPONSE TO DISCOVERY REQUESTS OF SHURBERG BROADCASTING OF HARTFORD"** was served this 14th day of August, 1998, by first class U.S. mail, to the following:

The Honorable John M. Frysiak*
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W.
Room 223
Washington, D.C. 20554

James Shook, Esq.*
Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 8202-F
Washington, D.C. 20554

Harry F. Cole, Esq.
Bechtel & Cole, Chartered
1901 L Street, N.W.
Suite 250
Washington, D.C. 20036


Margie Sutton Chew

*VIA HAND-DELIVERY